

July 28, 2005

The Honorable Anthony Principi
BRAC Commission
Polk Building
Suites 600 and 625
2521 South Clark Street
Arlington, VA 22202

Dear Chairman Principi:

We respectfully urge you to remove Naval Submarine Base New London from the Base Realignment and Closure List. The Department of Defense's recommendation to close SUBASE New London is based on substantially flawed assumptions and analysis, as well as a force structure plan that assumes unacceptable risk. Closing SUBASE New London would critically injure the capabilities and readiness of the United States' submarine force, the Navy and the Armed Forces at large. The following text and attachment address some of our principal concerns about the recommendation to close SUBASE New London.

Force Structure Plan

The force structure plan used to justify closing SUBASE New London represents a substantial deviation from the BRAC criteria. A future force level of 37 to 41 attack submarines could not meet the United States national security needs without assuming unacceptable risks. Already, the Navy reports that U.S. Combatant Commanders are collectively asking for 150 percent of the critical mission days that the submarine force can provide. The Armed Forces should not depend on unproven conceptual operations and nonexistent weapon systems for missions twenty years from now. Similarly, we should not depend on an assessment of the threat environment in 2025. The U.S. intelligence community, we know, has consistently underestimated the military modernization programs of China, which will have three times as many attack submarines as the United States by 2025, given current trends.

Though long-range projections can help the Navy plan for the future, they should not be allowed to unilaterally eliminate force level options or flexibility in the fleet. Unfortunately, the 2005 BRAC recommendation on SUBASE New London appears to do just that, using a 21 percent reduction in the attack submarine fleet to justify an unwise and imprudent drawdown in subsurface infrastructure that will produce nominal savings at most.

The attack submarine is the best anti-submarine weapon; yet, while the rest of the world ramps up production, the 2005 Force Structure Plan would predetermine a dangerously small subsurface fleet if accepted. Fundamental questions remain about the optimal size and character of the U.S. submarine fleet. A decision to close SUBASE New London would eliminate the fleet's surge capacity, terminating the force level debate prematurely. This would prevent the Navy from taking advantage of exciting undersea warfare and propulsion technologies that could drastically reduce the size and cost of future submarines. These breakthroughs in design and

production could help the Navy procure more attack submarines with only modest spending increases.

Center of Excellence for Undersea Warfare

SUBASE New London is the nation's center of excellence for undersea warfare. The base is surrounded by the Electric Boat Corporation, Submarine Development Squadron 12, the Naval Undersea Warfare Center, the Naval War College, the Institute for Undersea Exploration, and several universities with world-class research institutions. The area is also home to world-class subcontractors and a highly skilled labor force intimately familiar with submarine design, construction and maintenance. This convergence creates unique readiness and training opportunities for the Navy, military value wrongly dismissed in the Navy analysis.

Military Value

The Department of the Navy underestimated the military value of SUBASE New London and, as a result, substantially deviated from the BRAC selection criteria. Attachment 1 provides detailed examples of flawed analysis used to incorrectly conclude that the base should be closed.

Other Criteria

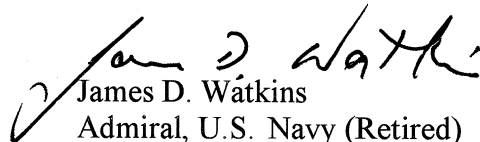
Estimated cost savings appear to have driven the recommendation to shut down SUBASE New London. An independent review of the analysis clearly shows that the Department of Defense underestimated the costs of moving and reconstituting SUBASE New London's assets, while overestimating savings from the proposed closure.

Naval Submarine Base New London is a proven strategic asset. It would take the Navy generations to reconstitute its unique military value elsewhere. That is years the Armed Forces cannot afford to lose, even if the nation could pay the financial and readiness cost of scattering the base. A final decision to close SUBASE New London would undermine the subsurface fleet and predetermine a high-risk force level for little or no gain. We urge you to protect the nation from this mistaken recommendation.

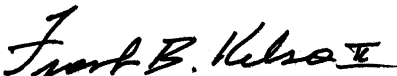
Sincerely,



Carlisle A. H. Trost
Admiral, U.S. Navy (Retired)
Former Chief of Naval Operations



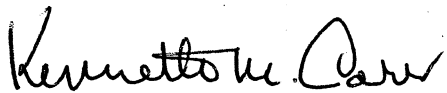
James D. Watkins
Admiral, U.S. Navy (Retired)
Former Chief of Naval Operations
Former Secretary of Energy



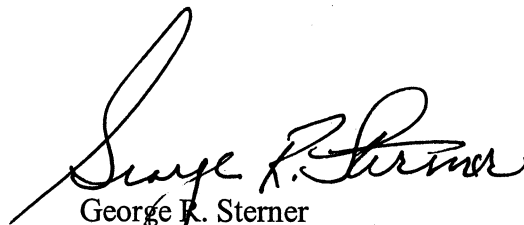
Frank B. Kelso II
Admiral, U.S. Navy (Retired)
Former Chief of Naval Operations



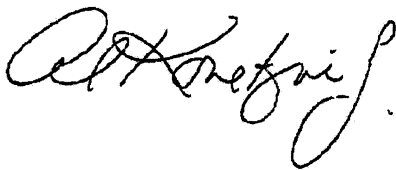
Frank L. Bowman
Admiral, U.S. Navy (Retired)
Former Director of Naval Reactors



Kenneth M. Carr
Vice Admiral, U S Navy (Retired)
Former Commander Submarine Force, US Atlantic Fleet
Former Chairman of the Nuclear Regulatory Commission



George R. Sterner
Vice Admiral, U S Navy (Retired)
Former Commander, Naval Sea
Systems Command



Al Konetzni
Vice Admiral, U S Navy (Retired)
Former Commander Submarine Force, U S Pacific Fleet



N. Ronald Thunman
Vice Admiral, U S Navy (Retired)
Former Deputy Chief of Naval Operations, Submarine Warfare

Attachment 1

Substantial Deviation in Military Value Scoring:

In scoring the Submarine Base New London, the Navy analysis team did not grant extra points for hosting the nation's only submarine school, opting instead to treating it as a "tenant command." Naval Submarine School (SUBSCOL) is the premier subsurface educational center in the world. Its co-location with 18 home ported fast attack submarines affords the Navy significant readiness and training advantages largely because sailors can stay with their boats (and families) for months while they learn and practice. Additionally, the Navy gains from the institution's proximity to the Electric Boat Corporation, builder and maintainer of many SUBSCOL assets, including its most advanced trainers. Basic military judgment dictates that SUBSCOL is not comparable to a local damage control trainer; yet that is how the institution was valued.

The Navy also deviated from the BRAC criteria when it gave SUBASE New London a low military value score for its considerable berthing capacity. SUBASE New London has piers to safely and efficiently berth at least 20 attack submarines. Conversely, moving three squadrons to Norfolk Naval Station and Naval Submarine Base Kings Bay would necessitate an unprecedented level of nesting – an operational and readiness hazard – even after completing significant military construction projects. That SUBASE New London received more points for modern piers than Naval Submarine Base Kings Bay, but zero points for cruiser length equivalents, highlights the irrationality of this scoring metric. Fleet Forces Command opposed any scenario to close SUBASE New London during the 2005 BRAC round deliberations because it would hurt the submarine force's flexibility, readiness, and capabilities on the East Coast. We agree with that assessment.

The Navy's use of pier space to measure extra capacity in the subsurface fleet is inherently flawed because attack submarines, though relatively compact in terms of displacement and length, require a high level of maintenance. At the same time, the crews of attack submarines are small compared with their surface counterparts, but need relatively intensive training and education. The infrastructure – nuclear waterfront certification, intermediate maintenance, training, etc. – to support attack submarines and their crews is sophisticated and expensive. Once lost, such assets are especially difficult to reconstitute. These realities also help explain why the Fleet Forces Command argued against closing SUBASE New London during BRAC round deliberations.